



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 27, 2020

BY ECF AND EMAIL

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Joel Pena,*
18 Cr. 640 (RA)**

Dear Judge Abrams:

The parties have conferred regarding the anticipated change-of-plea hearing, currently scheduled for Thursday, June 4, 2020, at 2:30 p.m. If it is acceptable to the Court, the parties jointly and respectfully request a brief adjournment to Monday, June 15, 2020, at 12:00 p.m., which we understand may be a convenient time for the Court. The purpose of the requested adjournment is to permit the finalization of paperwork associated with the anticipated, upcoming change-of-plea. (The Government's plea offer from early March 2020 will continue to remain open for at least the duration of the requested adjournment.) This is approximately the fifth request for an adjournment of the anticipated change-of-plea, and the parties expect it to be the final such request. The Government also requests, with consent of the defense, for a corresponding exclusion of time under the Speedy Trial Act to permit the parties to finalize the anticipated disposition of this matter. *See* 18 U.S.C. § 3161(h)(7)(A).

Application granted. The change-of-plea hearing is adjourned to June 15, 2020 at 12:00 p.m. and will be held telephonically. Time is excluded to June 15, 2020, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(a).

SO ORDERED.

Ronnie Abrams, U.S.D.J.

May 28, 2020

Respectfully submitted,

GEOFFREY S. BERMAN
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Southern District of New York

By:
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cc: William J. Stampur, Esq. (by ECF and email)